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April 7, 2022

BY ECF

The Honorable Lorna G. Schofield
United States District Judge, Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Catherine McKoy, et al., v. The Trump Corporation, et al.*, 18-cv-09936 (LGS)

Dear Judge Schofield:

We write on behalf of Plaintiffs in the above-referenced action to provide an update in connection with the Court's Order dated March 28, 2022. ECF No. 377. Pursuant to the Court's Order, Plaintiffs have met and conferred again with Defendants concerning the two disputes that were identified in the parties' most recent joint status letter as having reached an impasse. *See* ECF No. 375. Those further meet-and-confers again resulted in impasse, and accordingly, consistent with the Court's Order, Plaintiffs intend to file two premotion letters tomorrow.

Plaintiffs also have continued to meet and confer with ACN on various document and discovery-related issues that Plaintiffs outlined in the parties' recent joint status letter. Those discussions are ongoing, and Plaintiffs and ACN are making some progress.¹ Accordingly, given the ongoing progress, Plaintiffs respectfully propose that they take one additional week to meet and confer further with ACN, and file any premotion letters on disputes that are ripe for resolution by the Court on or before next Friday, April 15. We have conferred with counsel for ACN and understand that ACN is prepared to continue meeting and conferring on these issues.

Respectfully submitted,



Roberta A. Kaplan

cc: Counsel of Record (via ECF)
Counsel for ACN (via ECF and email)

¹ Indeed, the status letter did not describe those discussions as having reached an impasse, *see* ECF No. 375 at 2, and the Court's March 28 order appears to apply only to discussions between "the parties" to the case, ECF No. 377 at 1.